Auditing Procedures Report

Issued under P.A.				, as amended.			
Local Unit of Go	vernment Typ	е			Local Unit Name		County
☐County	☐City	□Twp	□Village	⊠Other	Battle Creek	Area Transportation Study	Calhoun
Fiscal Year End			Opinion Date			Date Audit Report Submitted to State	
September 30, 2006		November 14, 2006			February 8, 2007		
We affirm that	:						
We are certifie	ed public a	ccountants	licensed to p	ractice in M	lichigan.		
We further aff Management		•				d in the financial statements, include	ding the notes, or in the

Ve a	re ce	ertifie	d public accountants licensed to practice in Michigan.
			rm the following material, "no" responses have been disclosed in the financial statements, including the notes, or in the Letter (report of comments and recommendations).
	YES	9	Check each applicable box below. (See instructions for further detail.)
1.	×		All required component units/funds/agencies of the local unit are included in the financial statements and/or disclosed in the reporting entity notes to the financial statements as necessary.
2.	×		There are no accumulated deficits in one or more of this unit's unreserved fund balances/unrestricted net assets (P.A. 275 of 1980) or the local unit has not exceeded its budget for expenditures.
3.	X		The local unit is in compliance with the Uniform Chart of Accounts issued by the Department of Treasury.
4.	×		The local unit has adopted a budget for all required funds.
5.	×		A public hearing on the budget was held in accordance with State statute.
6.	×		The local unit has not violated the Municipal Finance Act, an order issued under the Emergency Municipal Loan Act, or other guidance as issued by the Local Audit and Finance Division.
7.	×		The local unit has not been delinquent in distributing tax revenues that were collected for another taxing unit.
8.	X		The local unit only holds deposits/investments that comply with statutory requirements.
9.	×		The local unit has no illegal or unauthorized expenditures that came to our attention as defined in the <i>Bulletin for Audits of Local Units of Government in Michigan</i> , as revised (see Appendix H of Bulletin).
10.	X		There are no indications of defalcation, fraud or embezzlement, which came to our attention during the course of our audit that have not been previously communicated to the Local Audit and Finance Division (LAFD). If there is such activity that has not been communicated, please submit a separate report under separate cover.
11.		×	The local unit is free of repeated comments from previous years.
12.	X		The audit opinion is UNQUALIFIED.
13.	×		The local unit has complied with GASB 34 or GASB 34 as modified by MCGAA Statement #7 and other generally accepted accounting principles (GAAP).
14.	X		The board or council approves all invoices prior to payment as required by charter or statute.
15.	×		To our knowledge, bank reconciliations that were reviewed were performed timely.
			of government (authorities and commissions included) is operating within the boundaries of the audited entity and is not

included in this or any other audit report, nor do they obtain a stand-alone audit, please enclose the name(s), address(es), and a description(s) of the authority and/or commission.

I, the undersigned, certify that this statement is complete and accurate in all respects.

i, the undersigned, certary that this statement is complete and accurate in an respects.									
We have enclosed the following:	Enclosed	Not Require	Not Required (enter a brief justification)						
Financial Statements	X								
The letter of Comments and Recommendations	\times								
Other (Describe)									
Certified Public Accountant (Firm Name)			Telephone Number						
REHMANN ROBSON			517.787.6503						
Street Address			City	State	Zip				
675 Robinson Road			Jackson	MI	49203				
Authorizing CPA Signature		ited Name		License Number					
Mark Hellings	l N	Mark T. Kettner, CPA, CGFM			11673				



Springfield, Michigan

FINANCIAL STATEMENTS

For the Year Ended September 30, 2006



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INDEPENDENT AUDITORS' REPORT

November 14, 2006

Policy Committee Battle Creek Area Transportation Study City of Battle Creek, Michigan

We have audited the accompanying basic financial statements of the *Battle Creek Area Transportation Study* as of and for the year ended September 30, 2006, as listed in the table of contents. These financial statements are the responsibility of the Study's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the *Battle Creek Area Transportation Study* as of September 30, 2006, and the changes in its financial position and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

The Study has not presented Management's Discussion and Analysis (MD&A) as required supplementary information that the Governmental Accounting Standards Board has determined is necessary to supplement, although not required to be, part of the financial statements.

Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The schedules listed in the table of contents are presented for purposes of additional analysis and are not a required part of the basic financial statements of the *Battle Creek Area Transportation Study*. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly presented in all material respects in relation to the basic financial statements taken as a whole.



Statement of Net Assets September 30, 2006

Assets	
Current assets:	
Cash	\$ 25
Accounts receivable	36
Due from grantor agencies	39,279
Due from City of Battle Creek	28,181
Total current assets	67,521
Capital assets, net	2,495
Total assets	70,016
Liabilities	
Current liabilities:	
Accounts payable	4,164
Accrued payroll	2,099
Due to grantor agencies	10,245
Accrued compensated absences	5,169
Total liabilities	21,677
Net assets	
Invested in capital assets	2,495
Unrestricted	45,844
Total net assets	\$ 48,339

The accompanying notes are an integral part of these financial statements.

Statement of Activities For the Year Ended September 30, 2006

Program revenue - operating grants and contributions	
Federal grants:	
Federal Highway Administration	\$ 107,156
Federal Transit Administration	22,264
State grant	23,134
Local government contributions:	
City of Battle Creek	21,933
Calhoun County Road Commission	14,980
City of Springfield	2,067
Other revenue	 500
Total program revenue	 192,034
Expenses - transportation studies	
Data collection and analysis	72,999
Long range transportation planning	23,604
Short range transportation planning	1,259
Special projects and studies	30,207
Public involvement	7,590
Program development and management	46,221
Non-grant activity	 2,770
Total expenses	 184,650
Change in net assets	7,384
Net assets, beginning of year	 40,955
Net assets, end of year	\$ 48,339

The accompanying notes are an integral part of these financial statements.

Statement of Cash Flows For the Year Ended September 30, 2006

Cash flows from operating activities:		
Receipts from other governments	\$	205,479
Payments to employees		(142,783)
Payments to suppliers		(59,272)
Net cash provided by operating activities		3,424
Cash flows used in capital and related financing activities: Acquisition of capital assets		(3,424)
Net change in cash		-
Cash, beginning of year		25
Cash, end of year	\$	25
Reconciliation of operating income to net cash provided by operating activities		
Operating income	\$	7,384
Adjustments to reconcile operating income to	Ψ	,,00.
net cash provided by operating activities:		
Depreciation		1,535
Changes in assets and liabilities:		
Receivables		8,687
Due from City of Battle Creek		(17,891)
Accounts payable		38
Accrued expenses		(1,087)
Due to grantor agencies		4,758
Net cash provided by operating activities	\$	3,424

The accompanying notes are an integral part of these financial statements.

Notes To Financial Statements

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Reporting Entity

The Battle Creek Area Transportation Study ("Study") is an intermunicipality committee organized under Michigan Public Act 200 of 1957. The Study's purpose is to assist in the development and preservation of a safe, effective, well-maintained, efficient, and economical transportation system for the Battle Creek metropolitan area which minimizes its negative impacts on the physical and social environments and related land use. The Study is not a component unit of any other government.

Basis of Accounting

The Study uses a single proprietary or enterprise fund to account for and report its financial activities. The financial statements are presented using the economic resources measurement focus and the accrual basis of accounting. Revenues are recorded when earned and expenses are recorded at the time liabilities are incurred, regardless of when the related cash flows take place. The Study follows private-sector standards of accounting and financial reporting issued prior to December 1, 1989, unless those standards conflict with guidance of the Governmental Accounting Standards Board. Governments also have the option of following subsequent private-sector guidance for their enterprise funds, subject to this same limitation. The Study has elected not to follow subsequent private-sector guidance.

Cash

The Study's cash consists of \$25 in petty cash on hand. The Study does not maintain its own depository accounts. The City of Battle Creek (a member government of the Study) maintains accounting records, deposits cash receipts and processes cash disbursements through the City's pooled cash accounts. The amount reported as due from City of Battle Creek at year end represents the balance of the Study's interest in the pooled cash account of the City at year end.

Capital Assets

Equipment is recorded at cost and is depreciated using the straight-line method over estimated useful lives of three to five years.

Notes To Financial Statements

Compensated Absences

It is the Study's policy to permit employees to accumulate earned but unused vacation leave pay benefits up to a maximum of fifteen days or the equivalent of three normal work weeks. All vacation pay is accrued when incurred since 100 percent of the unused benefits are payable upon employee separation from service with the Study.

2. DUE FROM/TO GRANTOR AGENCIES

Amounts reported as due from and due to grantor agencies represent the difference between costs eligible for reimbursement and the amount received to date. The details of amounts due from and due to grantor agencies are as follows:

	G	ue from Frantor gencies	G	Due to Grantor Agencies		
FHWA, Section 112						
Billed	\$	25,003	\$	-		
2003 cost settlement		-		786		
2004 cost settlement		3,276		-		
2005 cost settlement		-		3,123		
2006 cost settlement		-		3,453		
Total FHWA, Section 112		28,279		7,362		
FTA, Section 5303						
Billed		4,733		_		
2003 cost settlement		-		197		
2004 cost settlement		708		-		
2005 cost settlement		-		632		
2006 cost settlement		_		757		
Total FTA, Section 5303		5,441		1,586		
MDOT, M-Fund						
Billed		5,321				
2003 cost settlement		3,321		383		
2004 cost settlement		238		363		
2004 cost settlement		236		366		
2006 cost settlement		-		548		
Total MDOT - M-Fund	-	5,559		1,297		
		3,339		1,491		
Total	\$	39,279	\$	10,245		

Notes To Financial Statements

3. CAPITAL ASSETS

Capital asset activity for the year ended September 30, 2006, was as follows:

	Beginning Balance		· ·			eletions	Ending Balance		
Capital assets, being depreciated - Equipment	\$	48,101	\$	3,424	\$	24,505	\$	27,020	
Less accumulated depreciation for Equipment	-	47,495		1,535		24,505		24,525	
Capital assets, net	\$	606	\$	1,889	\$		\$	2,495	

4. OPERATING LEASES

The Study leases office space from the City of Springfield (a member government of the Study) under an operating lease. The lease is a ten-year non-cancelable operating lease requiring annual payments of \$4,000 through October 2012. The following is a schedule of future minimum lease payments required under this operating lease as of September 30, 2006:

Years Ending September 30	Amount
2007	\$ 4,000
2008	4,000
2009	4,000
2010	4,000
2011	4,000
2012-2013	8,000
Total	<u>\$ 28,000</u>

During the year ended September 30, 2006, the Study had rent expense of \$4,000.

Notes To Financial Statements

5. DEFINED CONTRIBUTION PENSION PLAN

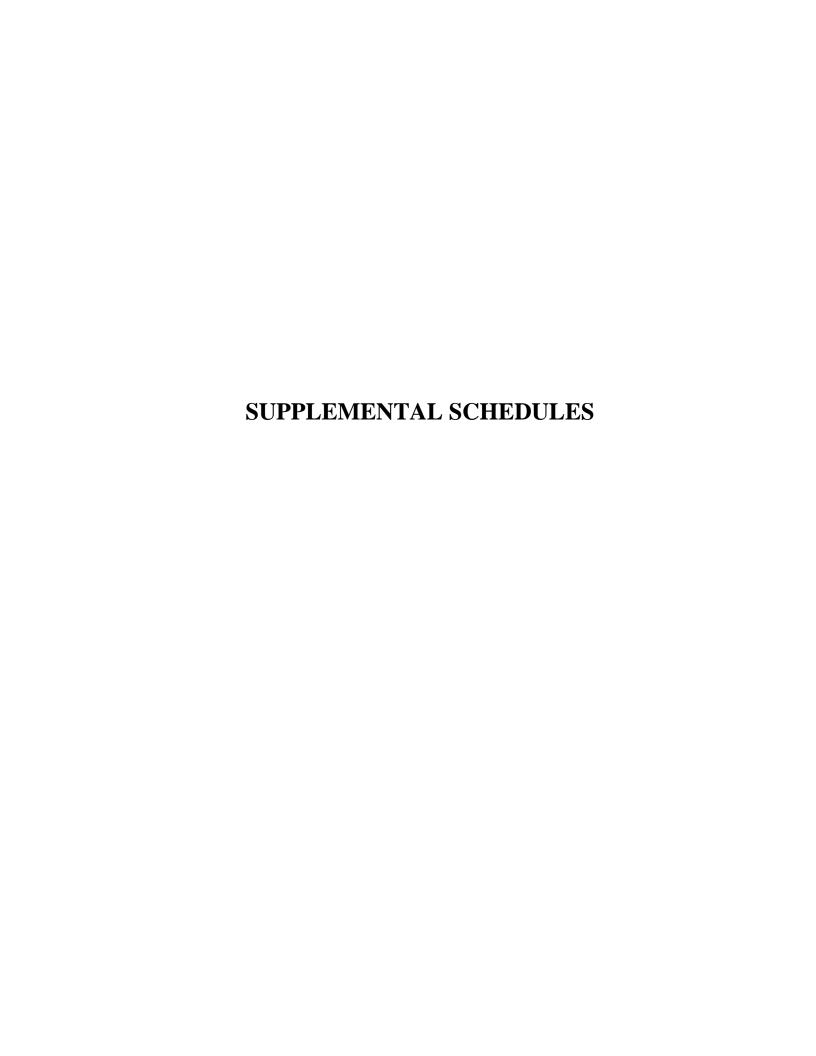
The Study provides pension benefits for all of its employees through a defined contribution pension plan. The plan requires the Study to contribute 15% of each qualified employee's base salary to the plan. Plan provisions and contribution requirements are established and may be amended by the Study's Policy Committee. The Study made the required contribution of \$15,709 for the year ended September 30, 2006.

6. RISK MANAGEMENT

The Study is exposed to various risks of loss related to torts, theft of, damage to, and destruction of assets; errors and omissions; injuries to employees; and natural disasters. During the year ended September 30, 2006, the Study carried commercial insurances to cover all risks of losses. The Study has had no settled claims resulting from these risks that exceeded their commercial coverage in any of the past three fiscal years.

7. RELATED PARTY TRANSACTIONS

As discussed previously, the Study has entered into certain agreements with member governments. The two agreements are with the City of Battle Creek for accounting services and with the City of Springfield for the lease of office space. During the year ended September 30, 2006, the Study paid accounting service fees to the City of Battle Creek in the amount of \$3,300 and rent expense to the City of Springfield in the amount of \$4,000.



Battle Creek Area Transportation Study Schedule of Expenses by Funding Source - Budget and Actual For the Year Ended September 30, 2006

		Federal Highway Administration							
			Section 1	12 Fu	ınds				
			Project A	greer	nent				
Work		#20	06-0001(Z1) (Jol	o#85192)		Local	Mato	ch
Element Description			Budget	Actual		Budget		Actual	
DATA CO	LECTION & ANALYSIS								
1.0000	Data Collection and Analysis	\$	44,931	\$	34,041	\$	9,963	\$	7,548
1.0040	Asset Management		971		855		215		190
	Subtotal		45,902		34,896		10,178		7,738
LONG RA	NGE TRANSPORTATION PLANNING								
2.0428	2030 Long Range Transportation Plan		20,981		16,422		4,652		3,641
SHORT R	ANGE TRANSPORTATION PLANNING								
2.0520	Short Range Transit Planning								
SPECIAL	PROJECTS AND STUDIES								
2.0601	Transportation Improvement Program		8,070		8,070		1,790		1,789
2.0618	Coord. with Statewide Planning		2,132		2,255		473		500
2.0619	Special Studies		1,170		985		259		218
2.0641	Safety Conscious Planning		4,643		3,031		1,030		672
2.0645	Air Quality Planning		6,664		5,951		1,478		1,320
	Subtotal		22,679		20,292		5,030		4,499
PUBLIC I	NVOLVEMENT								
3.0000	Public Involvement		2,754		1,853		611		411
3.0001	Transportation and Safety Education		4,606		3,427		1,021		760
	Subtotal		7,360		5,280		1,632		1,171
PROGRA	M DEVELOPMENT AND MANAGEMENT								
4.0102	Unifies Work Program		3,929		3,287		871		729
4.0103	Program Management		28,011		26,979		6,211		5,982
	Subtotal		31,940		30,266		7,082		6,711
	TOTAL	\$	128,862	\$	107,156	\$	28,574	\$	23,760

Michigan Department Federal Transit Administration of Transportation **Section 5303 Funds** 100% Reimbursed **Project Agreement Asset Management** #2006-001(Z2) (#85188) #2006-0001(Z3R1) **Local Match Budget Budget Budget** Actual Actual Actual \$ \$ 1,937 \$ 1,468 \$ \$ 7,750 \$ 5,871 30,000 106 93 22,910 26 23 7,856 5,964 1,963 1,491 30,000 22,910 3,619 2,833 905 708 1,344 1,007 336 252 1,972 493 493 1,972 232 245 58 61 202 170 50 42 1,134 741 284 185 1,149 1,026 287 257 4,689 4,154 1,172 1,038 475 320 80 119 795 591 199 148 1,270 911 318 228 960 803 240 201 6,592 6,844 1,711 1,648 7,804 7,395 1,951 1,849

\$

6,645

5,566

\$

22,264

26,582

Continued...

22,910

30,000

\$

Battle Creek Area Transportation Study Schedule of Expenses by Funding Source - Budget and Actual (Concluded) For the Year Ended September 30, 2006

Michigan Department

		O	nsportation		
			Reimbursed	_	
			afety		
Work			-0001(Z4)	To	tals
Element	Description	Budget	Actual	Budget	Actual
DATA CO	DLECTION & ANALYSIS				
1.0000	Data Collection and Analysis	\$ -	\$ -	\$ 64,581	\$ 48,928
1.0040	Asset Management	_		31,318	24,071
	Subtotal		-	95,899	72,999
LONG RA	ANGE TRANSPORTATION PLANNING				
2.0428	Update the 2025 Transportation Plan			30,157	23,604
SHORT R	ANGE TRANSPORTATION PLANNING				
2.0520	Short Range Transit Planning			1,680	1,259
SPECIAL	PROJECTS AND STUDIES				
2.0601	Transportation Improvement Program	-	_	12,325	12,324
2.0618	Coord. with Statewide Planning	-	-	2,895	3,061
2.0619	Special Studies	-	-	1,681	1,415
2.0641	Safety Conscious Planning	1,500	224	8,591	4,853
2.0645	Air Quality Planning	-	-	9,578	8,554
	Subtotal	1,500	224	35,070	30,207
PUBLIC I	NVOLVEMENT				
3.0000	Public Involvement	-	-	3,959	2,664
3.0001	Transportation and Safety Education	-	-	6,621	4,926
	Subtotal	-		10,580	7,590
PROGRA	M DEVELOPMENT AND MANAGEMENT				
4.0102	Unifies Work Program	-	-	6,000	5,020
4.0103	Program Management	-	-	42,777	41,201
	Subtotal	-		48,777	46,221

224

\$ 222,163

TOTAL

Schedule of Allowable Costs (exclusive of costs provided by local governments) For the Year Ended September 30, 2006

	Direct		Indirect		Total	
Salaries and wages	\$	60,302	\$	30,484	\$	90,786
Fringe benefits	Ψ	33,816	Ψ	17,094	Ψ	50,910
Office supplies		_		1,208		1,208
Printing and copying		_		209		209
Postage		-		303		303
Membership and subscriptions		-		301		301
Professional services		-		789		789
Bookkeeping services		-		3,300		3,300
Training and travel		-		1,834		1,834
Communications		-		2,287		2,287
Insurance and bonds		-		4,025		4,025
Office equipment maintenance		-		260		260
Rent		-		4,000		4,000
Depreciation				1,535		1,535
	\$	94,118	\$	67,629	\$	161,747
Other direct costs	\$	3,021				
Indirect costs as a percentage of direct payroll and fringe benefits 71.856%						
Fringe benefits as a percentage of salaries and wages						56.077%
Fringe benefit detail Vacation, sick and holidays Social security and Medicare	\$	9,433 5,427	\$	4,768 2,744	\$	14,201 8,171
Retirement contribution		10,434		5,275		15,709
Health and welfare		7,852		3,273		13,709
		7,832 670		3,969		
Workers' compensation and unemployment						1,008
	\$	33,816	\$	17,094	\$	50,910



November 14, 2006

To the Policy Committee of the Battle Creek Area Transportation Study Springfield, Michigan

We have audited the financial statements of the *Battle Creek Area Transportation Study* for the year ended September 30, 2006, and have issued our report thereon dated November 14, 2006. Professional standards require that we provide you with the following information related to our audit.

Our Responsibility Under Auditing Standards Generally Accepted in the United States of America

As stated in our engagement letter dated November 10, 2006, our responsibility, as described by professional standards, is to plan and perform our audit to obtain reasonable, but not absolute, assurance that the financial statements are free of material misstatement and are fairly presented in accordance with accounting principles generally accepted in the United States of America. Because an audit is designed to provide reasonable, but not absolute assurance and because we did not perform a detailed examination of all transactions, there is a risk that material misstatements may exist and not be detected by us.

As part of our audit, we considered the internal control of the Battle Creek Area Transportation Study. Such considerations were solely for the purpose of determining our audit procedures and not to provide any assurance concerning such internal control.

Significant Accounting Policies

Management is responsible for the selection and use of appropriate accounting policies. In accordance with the terms of our engagement letter, we advised management about the appropriateness of accounting polices and their application. The significant accounting policies used by the Battle Creek Area Transportation Study are described in Note 1 to the financial statements. No new accounting policies were adopted and the application of existing policies was not changed during the year. We noted no transactions entered into by the Battle Creek Area Transportation Study during the year that were both significant and unusual, and of which, under professional standards, we are required to inform you, or transactions for which there is a lack of authoritative guidance or consensus.

Accounting Estimates

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimates affecting the financial statements were:

Management's estimate of the useful lives of other depreciable fixed assets is based on the length of time it is believed that those assets will provide some economic benefit in the future. We evaluated the key factors and assumptions used to develop the useful lives of those assets in determining that they are reasonable in relation to the financial statements taken as a whole.

Audit Adjustments

For purposes of this letter, professional standards define an audit adjustment as a proposed correction of the financial statements that, in our judgment, may not have been detected except through our auditing procedures. An audit adjustment may or may not indicate matters that could have a significant effect on the Battle Creek Area Transportation Study's financial reporting process (that is, cause future financial statements to be materially misstated). As described in the accompanying memorandum, we proposed numerous material adjusting journal entries, which in our judgment, had a significant effect on the Battle Creek Area Transportation Study's financial reporting process.

Disagreements with Management

For purposes of this letter, professional standards define a disagreement with management as a matter, whether or not resolved to our satisfaction, concerning a financial accounting, reporting, or auditing matter that could be significant to the financial statements or the auditor's report. We are pleased to report that no such disagreements arose during the course of our audit.

Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the governmental unit's financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

Issues Discussed Prior to Retention of Independent Auditors

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Battle Creek Area Transportation Study's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

Difficulties Encountered in Performing the Audit

We encountered no difficulties in dealing with management in performing our audit.

This letter and the accompanying memorandum are intended for the use of the Battle Creek Area Transportation Study, management, and federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

Very truly yours,

Rehmann Loham

Comments and Recommendations

For the Year Ended September 30, 2006

During our audit we became aware of certain issues regarding internal control and financial reporting. This memorandum summarizes our comments and suggestions regarding these matters. This memorandum does not affect our report dated November 14, 2006 on the financial statements of the Battle Creek Area Transportation Study.

Internal Controls – Segregation of Duties

Management is responsible for establishing and maintaining effective internal control over financial reporting and the safeguarding of the Village's assets. In establishing appropriate internal controls, careful consideration must be given to the cost of a particular control and the related benefits to be received. Accordingly, management must make the difficult decision of what degree of risk it is willing to accept, given the government's unique circumstances.

As is the case with many organizations of similar size, the Study lacks a sufficient number of accounting personnel in order to ensure a complete segregation of duties within its accounting function. Ideally, no single individual should ever be able to authorize a transaction, record the transaction in the accounting records, and maintain custody of the assets resulting from the transaction. Effectively, proper segregation of duties is intended to prevent an individual from committing an act of fraud or abuse and being able to conceal it.

Events of recent years have given rise to a heightened awareness of the risks of fraud and abuse, especially in the governmental environment, where public accountability is at its highest. The purpose of internal controls is to provide reasonable, but not absolute, assurance that assets are safeguarded against loss from unauthorized use or disposition, and that transactions are properly authorized and recorded. Any limitations on the effectiveness of a government's internal controls carries with it a greater risk of fraud and abuse.

As stated previously, the establishing and maintaining of internal controls is the responsibility of management. As the Study's independent external auditors, we are specifically banned by professional standards from performing any management functions. In other words, the annual audit is <u>not</u> a part of the Study's internal control structure, and cannot not be relied upon as part of *management's* systems to deter or detect fraud and abuse.

While there are, of course, no easy answers to the challenge of balancing the costs and benefits of internal controls and the segregation of duties, we would nevertheless encourage management to actively seek ways to further strengthen its internal control structure by requiring as much independent review, reconciliation, and approval of accounting functions by qualified members of management as possible.

Comments and Recommendations

For the Year Ended September 30, 2006

Accounting for Capital Assets

The Government Finance Officers Association (GFOA) has established three recommended practices for governments that relate to the accounting for capital assets, which can be found on their website at http://www.gfoa.org/services/rp/caafr.shtml. In the first recommended practice titled "Establishing Appropriate Capitalization Thresholds for Tangible Capital Assets," the GFOA recommends that capitalization thresholds not be established at an amount less than \$5,000 for any individual item. The second recommended practice relates to establishing estimated useful lives of capital assets. The last practice recommends guidelines to ensure control over noncapitalized items.

As we noted in the prior year, equipment is recorded at cost with no stated capitalization threshold and is depreciated over estimated useful lives of three to five years. We recommend that the Agency review the GFOA's recommended practices and consider modifying its current policy on capital assets.

* * * * * *